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*Cadila Healthcare, Limited*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

TAKEDA PHARMACEUTICAL  
COMPANY LIMITED, TAKEDA  
PHARMACEUTICALS NORTH  
AMERICA, INC., TAKEDA  
PHARMACEUTICALS LLC,  
TAKEDA PHARMACEUTICALS  
AMERICA, INC., and ETHYPHARM,  
S.A.,

Plaintiffs,

v.

ZYDUS PHARMACEUTICALS USA  
INC. and CADILA HEALTHCARE  
LIMITED,

Defendants.

CIVIL ACTION NO:  
3:10-CV-01723-JAP-TJB

**NOTICE OF  
DEFENDANTS' MOTION  
FOR RECONSIDERATION OF  
CLAIM CONSTRUCTION**

**[ORAL ARGUMENT REQUESTED]**

**Return Date: November 21, 2011**

**TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on November 21, 2011 or as soon thereafter as counsel can be heard, the undersigned counsel for Defendants Zydus

Pharmaceuticals, USA, Inc. and Cadila Healthcare, Limited (collectively "Zydus") will move pursuant to Local Civil Rule 7.1(i) before the Honorable Joel A. Pisano, U.S.D.J., at the United States District Court for the District of New Jersey, for an Order granting Zydus's Motion for Reconsideration of Claim Construction.

**PLEASE TAKE FURTHER NOTICE** that in support of its Motion, Zydus will rely on the Memorandum of Law and the Declaration of Vincent P. Rao II, submitted herewith.

**PLEASE FURTHER TAKE NOTICE** that a proposed form of Order is submitted herewith in accordance with L. Civ. R. 7.1(e).

**PLEASE FURTHER TAKE NOTICE** that oral argument is requested.

Respectfully submitted,

Dated: October 19, 2011

KELLEY DRYE & WARREN LLP

By: s/Vincent P. Rao II  
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*Attorneys for Defendants  
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and Cadila Healthcare Limited*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 19, 2011 I caused to be served a copy of the foregoing Defendants Zydus Pharmaceuticals, USA, Inc. and Cadila Healthcare's Notice of Motion For Reconsideration Of Claim Construction, the Memorandum of Law in Support of the Motion, the Declaration Of Vincent P. Rao II in Support of the Motion and a Proposed Order on each interested party in this action in accordance with the electronic filing procedures of the United States District Court for the District of New Jersey.

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Dated: October 19, 2011

*s/Vincent P. Rao II*

Vincent P. Rao II